

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:) Bankruptcy Case No. 20-22585-GLT
Paul Anthony Ionadi,)
Debtor,) Chapter 13
Ronda J. Winnecour, Chapter 13)
Trustee,) Related to Doc. No. 123-119
Movant,) Hearing Date: April 5, 2023 @ 11:00 a.m.
v.) Responses Due: March 2, 2023
Paul Anthony Ionadi,)
Respondent.) Document No.

**RESPONSE IN SUPPORT OF MOTION OF THE CHAPTER 13 TRUSTEE TO
DISMISS CHAPTER 13 BANKRUPTCY CASE**

AND NOW comes the Debtor, Paul Anthony Ionadi, by and through his counsel, Calaiaro Valencik and David Z. Valencik, and present the following in support of *Motion of the Chapter 13 Trustee to Dismiss Chapter 13 Bankruptcy Case*:

1. The Court held a hearing on February 8, 2023 on Northwest Bank's Motion for Relief from Stay. See Doc. No. 119. At the hearing, the Chapter 13 Trustee made an oral motion to dismiss the chapter 13 bankruptcy.
2. The Debtor could not cure the deficiencies set forth on the record at the hearing.
3. The Debtor agrees and consents to the dismissal of the case provided that dismissal is without prejudice.

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WHEREFORE, the Debtor, Paul Anthony Ionadi, requests that the Chapter 13 Trustee's Motion to Dismiss is granted and the bankruptcy case be dismissed without prejudice.

Respectfully submitted,

Dated: March 2, 2023

BY: /s/ David Z. Valencik
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